

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

PROPOSED SCHEDULING ORDER

EVENT	PLANTIFF'S DATE	DEFENDANT'S DATE
Parties shall hold the Rule 26(f) Conference	July 2, 2020	
Plaintiff shall serve its written settlement proposal to Defendant	July 10, 2020	
Parties shall serve their Initial Disclosures	July 16, 2020	
Parties shall submit a proposed Protective Order to the Court.	July 23, 2020	
Parties shall submit a proposed ESI Order to the Court.	July 23, 2020	
Plaintiff shall serve Preliminary Patent Disclosures (claim charts, file history, ownership, real parties in interest, etc.) [LR 16.6(d)(1)]	August 18, 2020	September 4, 2020
Deadline for conference on patent-related disclosures (both adequacy of plaintiff's disclosures and plan for defendant's disclosures)	September 8, 2020	October 2, 2020
Defendant shall serve Preliminary Patent Responses (Technical documents, non-infringement charts, invalidity contentions, etc.) [LR 16.6(d)(4)]	September 29, 2020	November 6, 2020
Plaintiff shall serve reply to Preliminary Patent Responses (validity allegations charts)	Not a requirement in Local Rules.	December 4, 2020
Parties exchange claim terms and proposed constructions [LR 16.6(e)(1)(A)]	October 20, 2020	December 18, 2020

EVENT	PLANTIFF'S DATE	DEFENDANT'S DATE
Parties file Opening Claim Construction Briefs [LR 16.6(e)(2)]	November 24, 2020	January 15, 2021
Parties file Responsive Claim Construction Briefs [LR 16.6(e)(4)]	January 5, 2021	February 26, 2021
Parties file Joint claim construction and prehearing statement [LR 16.6(e)(1)(D)]	January 15, 2021	March 12, 2021
Deadline for amendments of the pleadings and joinder of additional parties	February 5, 2021	March 26, 2021
MARKMAN HEARING	~ February 2021 (determined by the Court)	~ April 2021 (determined by the Court)
Claim Construction Order	(determined by the Court)	
STATUS CONFERENCE	(determined by the Court)	
Deadline for serving written discovery	April 15, 2021	July 23, 2021
Close of Fact Discovery	May 14, 2021	September 24, 2021
Parties serve Opening Expert Reports	May 28, 2021	October 22, 2021
Parties serve Rebuttal Expert Reports	June 28, 2021	November 19, 2021
Close of Expert Discovery (including completion of expert depositions)	July 28, 2021	December 17, 2021
Deadline to file dispositive motions	August 25, 2021	January 21, 2022
HEARING re: Dispositive Motions	~ October 2021 (determined by the Court)	(determined by the Court)
Parties file Joint Pre-Trial Memorandum	November 1, 2021	~3 wks before trial
PRE-TRIAL CONFERENCE	(determined by the Court)	
TRIAL	~ December 2021 (determined by the Court)	(determined by the Court)

Procedural Provisions

1. **Extension of Deadlines.** Motions to extend or modify deadlines will be granted only for good cause shown. All motions to extend shall contain a brief statement of the reasons for the request; a summary of the discovery, if any, that remains to be taken; and a specific date when the requesting party expects to complete the additional discovery, join other parties, amend the pleadings, or file a motion.

2. **Motions to Compel or Prevent Discovery.** Except for good cause shown, motions to compel discovery, motions for protective orders, motions to quash, motions to strike discovery responses, and similar motions must be filed no later than the close of fact discovery or the close of expert discovery, whichever deadline is relevant. If additional discovery is compelled by the court after the relevant deadline has passed, the court may enter such additional orders relating to discovery as may be appropriate.

3. **Reply Memoranda.** Parties need not seek leave of court to file a reply memorandum in response to an opposition to any motion, provided that such a reply memorandum does not exceed twelve pages, double-spaced, and is filed within seven days after service of the opposition memorandum. Parties may otherwise file reply or surreply memoranda only with leave of court. When such leave is sought, the moving party may file a proposed reply or surreply memorandum with the motion for leave.

4. **Status Conferences.** The court has scheduled status conferences for case management purposes. Any party who reasonably believes that a status conference will assist in the management or resolution of the case may request one from the court upon reasonable notice to opposing counsel.

5. **Additional Conferences.** Upon request of counsel, or at the court's own initiative, additional case-management or status conferences may be scheduled. Parties may request telephonic conferences where appropriate to avoid undue inconvenience or expense.

6. **Early Resolution of Issues.** The court recognizes that, in some cases, resolution of one or more preliminary issues may remove a significant impediment to settlement or otherwise expedite resolution of the case. Counsel are encouraged to identify any such issues and to make appropriate motions at an early stage in the litigation.

7. **Pretrial Conference.** Lead trial counsel are required to attend any pretrial conference.